

Privacy Notice BSL Employees

Who this notice applies to

This notice applies to all BSL employees and ex-employees, irrespective of the length or type of employment. This includes for example student workers, hourly employees, interns, part-time employees.

*This notice also applies to job applicants, permanent contractors and non-executive board members as and where applicable. Please also see the General Privacy Notice ([link](#)).

Data Controller / Data Protection Officer

BSL Business School Lausanne SA (BSL), Route de la Maladière 21, 1022 Chavannes-près-Renens, Switzerland is the Data Controller of the personal data you provide to BSL and determines the purposes for which, and the manner, in which such personal data is to be collected and processed. Personal data shall mean any information that relates to an identified or identifiable living natural person.

BSL's Dean Dr. David Claivaz acts as a representative for BSL and as its Data Protection Officer. Responsibilities include: overseeing and monitoring BSL's data protection procedures and ensuring they are compliant with Swiss data protection regulations (such as the Swiss Federal Act on Data Protection of 1 September 2023), and EU data protection regulations (General Data Protection Regulation 2016/679 of 27 April 2016 or GDPR), each as amended or replaced from time to time. He may be contacted at david.claivaz@bsl-lausanne.ch.

The categories of personal data that we collect and process include

- personal identifiers (such as name, unique employee number, national insurance number, contact details and addresses)
- characteristics (such as gender, age, language, nationality, marital status)
- work absence information (such as number of absences, absence reasons)
- contract information (such as dates of employment, FTE, roles, salary information, bank account details)
- medical information when relevant (such as incapacity to work, emergency medical information and emergency contact details)
- qualifications, training and recruitment information, including background checks and reference obtained from previous employers
- information relevant for the performance of the employment relationship, such as work permit information, work performance and behavior at work, disciplinary measures, working time information, work communication, information relating to the use of IT systems and applications, professional part-time activities
- photographs and videos (see below)
- security information (such as CCTV footage)

- cookies and other website usage data

Why we collect and use personal data

Personal data is generally collected and processed for the purpose of managing BSL's relationship with you, communicating with you and/or to provide you with information you may request from BSL. More specifically and in line with applicable laws, we may process your Personal Data for the following purposes:

- to the extent necessary to assess the employee's/job-applicant's suitability for the job and/or for the performance of the employment relationship, including: to plan and organize work, to assess, support, and develop employees in the performance of their duties, to evaluate work presence/absence and/or employee satisfaction, to evaluate and take disciplinary measures, to meet post-employment obligations
- to enable individuals to be paid and to be included in Swiss social security and BSL provided insurance and pension schemes
- to support individuals with administrative tasks (such as applying or extending a work/residence permit)
- to evaluate the use of IT systems and applications,
- to improve the management of Personal Data
- to inform about the development of Human Resources policies (such as recruitment, retention, absence)
- to protect your health and provide appropriate first-aid
- to assess the quality of our services
- to investigate any concerns or complaints
- to establish, defend or exercise claims
- to terminate the contractual relationship
- to meet the statutory requirements placed upon us by the cantonal and federal authorities

Personal Data may further be used for any other purpose you give your explicit consent to, or for purposes that may be of a legitimate interest to BSL.

Collecting personal data

Most of the personal data mentioned is directly provided by you during the recruiting process and in the course of your employment or obtained by actions of BSL or its data processors, e.g., through use of IT systems and applications. Insofar as permitted, we may also hold personal data about you that we have received from publicly accessible sources (e.g., social media channels), authorities or other third parties, such as other schools.

When submitting personal data, please make sure that the data is correct. When providing personal data about a person other than yourself, please make sure that you are permitted to provide the data and that this other person is aware of this Privacy Notice.

Personal data is essential for BSL's operational use. While the majority of personal data you provide to us is mandatory for the conclusion and performance of the contractual relationship,

some of it may be provided on a voluntary basis. We will inform you when providing personal data is voluntary, or necessary to fulfill our contractual obligations.

Special rules on camera surveillance, photographs and videos

For security and safety reasons, specific parts of the school campus may be under camera surveillance. BSL retains video images for a maximum of 1 year, after which they are deleted, unless the images must be retained for further investigation or law enforcement processes.

Photographs and videos of students, faculty, guest speakers and employees may be taken to record and share daily campus life in the course of the academic year. Students, faculty, guest speakers and employees may be identifiable in these photographs or videos. Such photographs and videos may be used for educational and internal informational purposes (e.g. keeping records of lessons, company visits, sports, events, employee training, , newsletter), for the identification of students, faculty, guest speakers and employees for health related purposes (e.g. allergies), or for marketing and publication purposes, if and to the extent you gave us your consent where required under applicable data protection laws.

Storing personal data

Personal data is stored in line with the Swiss data protection regulations and EU GDPR on servers located in Switzerland, EU-EFTA countries, USA and UK. BSL maintains appropriate technical and organizational measures to preserve the confidentiality and integrity of your personal data (protection against unauthorized or unlawful access or processing, accidental loss, destruction or damage, cyber-security).

BSL does not store your personal data indefinitely; personal data is only stored for as long as is necessary to serve the purposes described above. It may be processed beyond the end of our contractual relationship to establish, defend or exercise claims (during the applicable limitation period), meet legal or post-contractual obligations, including legal documentation requirements, and/or to safeguard other legitimate interests of BSL.

Who we share personal data with

BSL restricts the use of and access to personal data to those who have an absolute need to know in order to provide the services and serve the purposes described above (authorized personnel or agents). BSL will not share your personal data with any external parties other than set out in this Privacy Notice, or except with your explicit prior consent, or as required under applicable laws or regulations.

External recipients who BSL routinely shares personal data with are the following:

- any company or provider where sharing the information is necessary to make payments or book benefits to you (such as outsourced payroll provider, personnel insurance companies and brokers, pension fund)
- our local, cantonal and federal authorities to meet our legal obligations
- the emergency contacts specified by you or medical emergency providers (in case of an emergency)

- service providers to enable them to provide the service we have contracted them for (e.g., recruitment services, providers of IT services, travel insurance providers, providers of field trips)
- our auditors
- health authorities
- police forces, courts, tribunals

Where necessary, BSL will oblige external recipients to comply with this Privacy Notice and to process personal data securely and exclusively for the purposes allowed to BSL.

Transfer of personal data is usually limited to recipients located in Switzerland. However, transfer of personal data may occur to recipients located in the following countries: EU-EFTA, UK, USA. If external recipients or external service providers are located in countries whose legislation does not guarantee an adequate level of data protection, BSL will implement suitable safeguards in the form of appropriate contractual clauses, namely standard contractual clauses and model contracts for data transfers recognized by the Swiss Federal Data Protection and Information Commissioner, in order to ensure compliance with this Privacy Notice and applicable laws.

Automated data decisions

We usually do not use automated data decisions (these are decisions affecting data subjects that are completely automated, i.e. without human influence). Should this exceptionally be the case, we would inform you separately.

Your rights

Under data protection legislation, you have some rights regarding personal data processed by us in order to verify the lawfulness of processing. In particular, you have the right to:

- request information about your personal data processed by BSL
- request a copy of the personal data BSL holds on you; this includes the right to data portability, i.e., the right to receive your personal data in a structured, commonly used format
- restrict processing and/or object to the processing of personal data, in which case we may, however, no longer be in a position to provide any related services or perform our employment relationship with you
- request that your personal data is erased where there is no compelling reason for its continued processing
- request that your personal data is amended if it is inaccurate or incomplete

Where the processing of your personal data is based on your consent, you have the right to withdraw this consent at any time. Such withdrawal of consent will not affect the lawfulness of the processing based on consent before the withdrawal.

Please note that your rights pursuant to this section may be limited in order to preserve any preponderant interest of BSL or any third parties.

In addition, you have the right to lodge a complaint with the competent data protection authority. The competent data protection authority of Switzerland is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

Contact

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with BSL's Data Protection Officer, Dr. David Claivaz, via email at david.claivaz@bsl-lausanne.ch.

Amendments and last update

BSL reserves the right to make changes to this Privacy Notice from time to time, for example in the event of new developments or new legislation. We recommend that you revisit this Privacy Notice from time to time. The applicable version is available on the "Working at BSL" subsection of www.bsl-lausanne.ch.

This version was last updated November 2023.